

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

DAN JOHNSON, individually and on	)	
behalf of similarly situated individuals,	)	
	)	
<i>Plaintiff,</i>	)	
v.	)	Case No. 1:24-cv-01057
	)	
PACIFIC LIFE INSURANCE	)	Hon. Steven C. Seeger
COMPANY, ,	)	
	)	
<i>Defendant.</i>	)	

**DEFENDANT PACIFIC LIFE INSURANCE COMPANY’S**  
**RULE 12(b)(6) MOTION TO DISMISS**

Defendant Pacific Life Insurance Company, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby moves to dismiss all claims asserted against it in Plaintiff’s First Amended Complaint. In support of its motion, Defendant submits its Memorandum of Law, which is fully incorporated by reference herein.

**WHEREFORE**, Defendant Pacific Life Insurance Company respectfully requests that this Court grant the instant Motion and dismiss all claims asserted against it in the First Amended Complaint, and grant such other and further relief that the Court deems just and proper.

Dated: April 11, 2024

Respectfully submitted,

By: /s/ Wendy N. Enerson  
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